

Remarks:

The above amendments and these remarks are responsive to the final Office action dated December 13, 2005.

Prior to entry of this Amendment, claims 1, 3-20 and 22-27 were pending in the application. All claims stand rejected based on Bruce-Sanders (US 4,429,478), either alone or in combination with Cotter (US 3,873,769) and/or Tadokoro et al. (US 4,819,078). Applicants respectfully traverses these rejections.

Nevertheless, in view of the finality of the rejection, and in the interest of furthering prosecution of the application, applicants have cancelled claims 9, 10, 23 and 24, without prejudice. No new claims are added. Claims 1, 3-8, 11-20, 22 and 25-27 thus remain pending upon entry of this Amendment.

Claim 1 has been amended to incorporate the subject matter of claim 10, thus placing claim 10 in independent form (as claim 1). Claim 11 has been amended to change its dependency from claim 10 to claim 1 (pursuant to re-writing claim 1 as claim 10 in independent form). Claim 25 also has been rewritten in independent form. The present amendments thus are only to form, and applicants request that such amendments be entered regardless of any decision here as the amendments better frame the issues for appeal.

In view of the amendments above, and the remarks below, applicants respectfully request reconsideration of the application and allowance of the pending claims.

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Rejections under 35 U.S.C. § 102

Claims 23 and 24 stand rejected under 35 U.S.C. § 102(b) based on Bruce-Sanders. As noted above, claims 23 and 24 have been cancelled, without prejudice. The rejection under 35 U.S.C. § 102(b) thus is rendered moot.

Rejections under 35 U.S.C. § 103

Claims 18-20, 22, 25 and 27 stand rejected under 35 U.S.C. § 103(a) based on Bruce-Sanders in view of Tadokoro et al. Applicants respectfully traverse the rejection for the reasons set forth below.

Bruce-Sanders discloses a variable information sign including a display board (10) and a plurality of print modules (14) supported on a carriage (12) and movable therewith relative to the display board to deposit dry erase ink on the display board. As noted by the Examiner, "Bruce-Sanders does not specifically teach a scanner adapted to scan the writing surface." In fact, Bruce Sanders does not even mention a scanner, let alone a scanner adapted to scan the writing surface. The Examiner thus cites Tadokoro et al.

Tadokoro et al. discloses an electronic print board system including a write device (14) configured to print erasable document images onto a drawing sheet (1). As described by Tadokoro et al., the document images are derived from documents loaded into a document reader (13). Contrary to the Examiner's assertion, however, document reader (13) is not adapted to scan the writing surface. The document reader disclosed by Tadokoro et al. is configured to receive successive sheets fed into the reader by an operator (col. 4, lines 51-55). In fact, Figs 2, 4 and 5 of Tadokoro et al. suggest that the document reader is not physically associated with the drawing sheet, and thus is not capable of reading from the drawing sheet.

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Applicants further assert that the Examiner has failed to establish the *prima facie* obviousness of the rejected claims. *Prima facie* obviousness can only be established where there is some suggestion or incentive in the prior art itself to combine or modify the cited references as suggested by the Examiner. The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art also suggests the desirability of the modification. Inasmuch as Bruce-Sanders does not even consider use of a document reader (or scanner), there can be no motivation to employ the document reader of Tadokoro et al. in the system of Bruce-Sanders. The proposed combination thus is inappropriate, and the rejections based on this proposed combination must be withdrawn.

Moreover, even if Bruce-Sanders were modified according to the teachings of Tadokoro et al., the resulting system would still not include a scanner adapted to scan the writing surface of a presentation board. It would merely provide for receipt of individual sheets fed to a document reader by an operator. There would be no way of recording the image on the display board for re-writing on the message board at a later time.

Turning now to the particular claims, applicants note that claim 18 recites:

A presentation system comprising:
a presentation board adapted to display an image for simultaneous viewing by a plurality of viewers, the presentation board comprising:
a writing surface; and
a printer disposed to print non-permanent ink onto the writing surface;
a scanner adapted to scan the writing surface;
an electronic image; and
a processor adapted to transmit the electronic image to the printer.

As noted, neither Bruce-Sanders, nor Tadokoro et al. disclose or suggest a scanner adapted to scan the writing surface of a presentation board as recited in claim 18. Claim 18 thus is allowable over Bruce-Sanders in view of Tadokoro et al., and the rejection of claim 18 must be withdrawn. Claims 19, 20 and 22 depend from claim 18, and thus are allowable for at least the same reasons as claim 18.

As amended, claim 25 recites:

A method for creating an image to be viewed during a presentation comprising:
obtaining, in electronic form, the image to be viewed;
sending the image to a presentation system including a printer with a printhead adapted to print erasable ink onto a writing surface;
printing the image on the writing surface;
scanning an image on the writing surface;
saving the scanned image in electronic form; and
printing the scanned image on the writing surface at a later time.

Neither Bruce-Sanders, nor Tadokoro et al. disclose or suggest scanning an image on the writing surface and printing the scanned image on the writing surface at a later time, as recited in claim 25. Claim 25 thus is allowable over Bruce-Sanders in view of Tadokoro et al., and the rejection of claim 25 must be withdrawn.

Claim 27 recites:

A method for creating an image to be viewed on a presentation system during a presentation, wherein the presentation system includes a writing surface, a printer with a printhead adapted to print erasable ink onto the writing surface, and a scanner configured to scan an image on the writing surface, the method comprising:
scanning an image on a writing surface;
saving the scanned image in electronic form;
erasing the image; and
printing the scanned image on the writing surface at a later time using the printer.

Neither Bruce-Sanders, nor Tadokoro et al. disclose or suggest scanning an image on a writing surface, erasing the image, and printing the scanned image on the writing surface at a later time, as recited in claim 27. Claim 27 thus is allowable over

Bruce-Sanders in view of Tadokoro et al., and the rejection of claim 27 must be withdrawn.

Claims 9-11 and 26 stand rejected under 35 U.S.C. § 103(a) based on Bruce-Sanders in view of Cotter, and further in view of Tadokoro et al. Claims 1, 3-8 and 12-17 stand rejected under 35 U.S.C. § 103(a) based on Bruce-Sanders in view of Cotter. As noted above, claim 1 has been re-written to include the subject matter of claim 10 in independent form. The rejection of claim 1 thus is addressed herein as if it were rejected in view also of Tadokoro et al. Applicants respectfully traverse these rejections for the reasons set forth below.

As noted above, Bruce-Sanders discloses a variable information sign including a display board (10) and a plurality of print modules (14) supported on a carriage (12) and movable therewith relative to the display board to deposit dry erase ink on the display board. Cotter discloses an automatic drawing system including an X-Y plotter (30) with associated recording and erasing mechanisms (36, 38). As acknowledged by the Examiner, neither Bruce-Sanders nor Cotter discloses a scanner adapted to scan the writing surface. The Examiner thus again turns to Tadokoro et al.

Tadokoro et al. discloses an electronic print board system including a write device (14) configured to print erasable document images onto a drawing sheet (1), the document images being derived from documents loaded by an operator into a document reader (13). Tadokoro et al. does not disclose a scanner adapted to scan the writing surface adapted to receive erasable ink. As noted previously, Tadokoro et al. discloses nothing more than a document reader that may receive single sheets fed by an operator.

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As amended, claim 1 recites:

A presentation system comprising:
a writing surface coupled with a frame, the writing surface being adapted to receive erasable ink;
a printer coupled with the frame, the printer including a printhead configured to print an image on the writing surface with erasable ink; wherein the printhead is adapted to move along a traverse rail; and
a scanner adapted to scan the writing surface.

Neither Bruce-Sanders, nor Cotter, nor Tadokoro et al. disclose or suggest a scanner adapted to scan the writing surface adapted to receive erasable ink as recited in claim 1. Claim 1 thus is allowable over Bruce-Sanders in view of Cotter and Tadokoro et al., and the rejection of claim 1 must be withdrawn. Claims 3-8 and 11-17 depend from claim 1, and thus are allowable for at least the same reasons as claim 1.

Claim 26 recites:

A presentation system comprising:
a writing surface coupled with a frame, the writing surface being adapted to receive erasable ink;
a printer coupled with the frame, the printer including a printhead adapted to move along a traverse rail, where the printhead is configured to print an image on the writing surface with erasable ink; and
a scanner adapted to scan the writing surface.

Neither Bruce-Sanders, nor Cotter, nor Tadokoro et al. disclose or suggest a scanner adapted to scan the writing surface adapted to receive erasable ink as recited in claim 26. Claim 26 thus is allowable over Bruce-Sanders in view of Cotter and Tadokoro et al., and the rejection of claim 26 must be withdrawn.

Furthermore, as noted in the Applicants' November 21, 2005 Amendment, the Examiner has failed to establish the *prima facie* obviousness of the rejected claims. The Examiner has failed to identify any specific suggestion or incentive within the cited references themselves that would motivate one of ordinary skill to modify the references.

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In particular, the cited references fail to suggest that it would be less expensive to buy one printhead, as opposed to a plurality of printheads as used by Bruce-Sanders. Additionally, applicants note that the presumed simplicity of having a single printhead may impact the complexity, size, weight, and frequency of errors of the accompanying controller. Moreover, the cited references fail to suggest that one printhead would be less of a waste of resources, would require less monitoring and would be easier to replace and fix that printhead, as opposed to a plurality of printheads. Finally, the cited references fail to suggest that the printing apparatus should be modified to be similar to the use of one black cartridge in ink jet printers.

The Bruce-Sanders controller is described as only tracking the position of the carriage 12 to the right and left, as the vertical position of each printhead is fixed (see for example col. 7, line 50 to col. 8, line 36), and each printhead need only be directed to print pixels in the corresponding horizontal line. In contrast, the controller of Cotter is required to track the position of each pixel in both the X and Y axis, and control a single printhead to apply each pixel in the image. The references, singly or in combination, fail to provide a specific suggestion or motivation to modify the printheads of Bruce-Sanders to use a printhead adapted to move along a traverse rail.

For at least these reasons, the Examiner has failed to establish the *prima facie* obviousness of the subject matter of claims 1 and 12-17. In view of the above amendments and remarks, applicants request the withdrawal of the rejection of claims 1, 3-8, 11-17 and 26 under 35 U.S.C. § 103.

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Applicants believe that this application is now in condition for allowance, in view of the above amendments and remarks. Accordingly, applicants respectfully request that the Examiner issue a Notice of Allowability covering the pending claims. If the Examiner has any questions, or if a telephone interview would in any way advance prosecution of the application, please contact the undersigned attorney of record.

Respectfully submitted,

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to Examiner L. Divine, Group Art Unit 2624, Assistant Commissioner for Patents, at facsimile number (571) 273-8300 on February 22, 2006.



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